

MARIN

ENVIRONMENTAL

May 16, 2000

Mr. Richard Hathaway
Environmental Analyst III
Permitting, Enforcement & Remediation Division
Bureau of Water Management
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

RE: Submittal, Soil and Ground Water Characterization Work Plan
UCONN Football Stadium
East Hartford, CT

Dear Mr. Hathaway:

Enclosed for the Permitting, Enforcement & Remediation Division (PERD) review and approval, please find one (1) copy of the Rentschler Field Soil and Ground Water Characterization Work Plan, dated May 2000, as submitted by Marin Environmental, Inc., on behalf of the Connecticut Office of Policy and Management (OPM). The Work Plan incorporates written comments received from PERD, dated April 4, 2000, that were based upon the draft conceptual work plan, dated March 21, 2000, as well as comments from the Connecticut Department of Environmental Protection (CTDEP), OPM and construction management-related personnel.

The referenced PERD correspondence specifically noted that multi-media sampling should be performed for tolyltriazoles (i.e., additives to glycol de-icing compounds). Marin has completed a broad range of research relative to these particular compounds, a synopsis of which is included as Attachment 1 to this correspondence. The research indicated that neither an EPA, nor ASTM-approved analytical test method has been developed for these particular compounds. The basis of the Work Plan has been developed through the use of established SW-846 analytical methodologies. These methodologies are acceptable to the EPA, CTDEP, and are consistent with the general industry standard of care associated with these types of subsurface investigatory and characterization work plans.

Accordingly, due to the lack of an approved or standard analytical methodology, the analyses of tolyltriazoles are not included within the submitted Soil and Ground Water Characterization Work Plan.

Additionally, based upon Marin's review of historical data provided by Loureiro Engineering Associates, Inc. and United Technologies Corporation, any limited de-icing operations that may have been performed, were completed at the southern

RCRA RECORDS CENTER
FACILITY Pratt & Whitney / Mustang
I.D. NO. CTD 09 067 2001
FILE LOC. R-9
OTHER RDMS # 100149



RDMS DocID 00100149

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Mr. Richard Hathaway, PERD

May 16, 2000

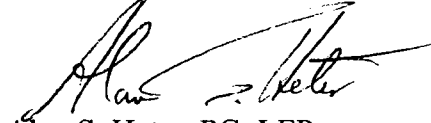
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portion of the airport. Considering this information, the presence of either glycols and/or tolyltriazoles within the northern airport area are considered unlikely.

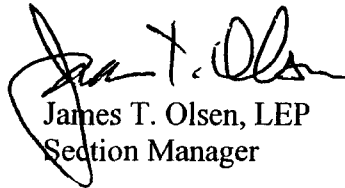
Marin and OPM appreciate the time and effort that you have extended on this Project. If any questions develop during the review and approval process, please contact our office at you earliest convenience.

Sincerely,

Marin Environmental, Inc.



Alan S. Heter, PG, LEP
Senior Hydrogeologist



James T. Olsen, LEP
Section Manager

attachment
encl.

- c. Mr. Phillip McLellan, OPM, with encl.
- Mr. James Walsh, Baystate Environmental Consultants, Inc., with encl.
- Mr. Fred Johnson, United Technologies Corporation, with encl.
- Mr. Lawrence Mowell, Pratt & Whitney, with encl.
- Ms. Lauren Levine, United Technologies Corporation, with encl.
- Ms. Kathleen McFadden, Esq., United Technologies Corporation, with encl.
- Ms. Franca DeRosa, Esq., Brown, Rudnick, Freed & Gesmer, with encl.

ATTACHMENT 1

Research and Data Gathering On Compounds Known As Tolyltriazoles Soil and Ground Water Characterization Work Plan UCONN Football Stadium East Hartford, CT

May 16, 2000

Several methods of research and investigation were employed to gather information relative to the analysis of the compounds known as tolyltriazoles. As discussed within the transmittal letter, these compounds are used in de-icing agents for the particular purposes of corrosion and rust inhibitors. Additionally, they are typically used within antifreeze agents for the same purposes.

The methods of research and investigation, as well as conclusions, are indicated below:

- 1) Discussions with three (3) analytical laboratories that perform a wide variety of analyses for compounds on a daily routine. Additionally, the laboratories accessed their respective data bases, including EPA methodologies and professional network systems. In summary, the laboratories and respective subsequent contact support mechanisms did not indicate that an EPA-approved methodology exists for tolyltriazoles.
- 2) Marin searched the EPA web site for information pertaining to available analytical methodologies specific to tolyltriazoles. The search indicated that there are no current analytical methodologies specific to tolyltriazoles.
- 3) Telephone conversation with Devon A. Cancilla, Ph.D., Assistant Professor with Western University, located in Bellingham, WA. Dr. Cancilla performs research in the area of tolyltriazoles and similar compounds within the USA and various other countries. He stated that there are no SW-846, or ASTM standard analytical methodologies for the analysis of tolyltriazoles. In fact, a component of his research is the development of an acceptable analytical methodology. He considers the analytical methodology development process to encompass many years. Currently, the research is performed by graduate students within the college chemistry laboratory without standard laboratory quality control and quality assurance procedures. Accordingly, analytical results vary widely and are currently used for the general purpose of a research-orientated data base.